

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: <u>3:15cr 286</u>
)	18 U.S.C. § 641
vs.)	18 U.S.C. § 981(a)(1)(C)
)	28 U.S.C. § 2461(c)
DENNIS OWEN PAULSEN)	
)	INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

That from in or about May 1997, to in or about June 2015, in the District of South Carolina, the defendant, DENNIS OWEN PAULSEN, knowingly and willfully did embezzle, steal, and purloin money of the Department of Veterans Affairs, a department or agency of the United States, by accepting payments made to him to which he knew he was not entitled, including but not limited payments for Compensation Benefits for Special Compensation, a Specialized Adaptation Grant and an Automobile Adaptation Grant, having a value of more than \$1,000.00;

In violation of Title 18, United States Code, Section 641.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That from in or about February 1997, to the date of this Indictment, in the District of South Carolina, the defendant, DENNIS OWEN PAULSEN, knowingly and willfully did embezzle, steal, and purloin money of the Social Security Administration, a department or agency of the United States, namely social security disability insurance benefits, by accepting payments made to him which he knew he was not entitled to, having a value of more than \$1,000.00;

In violation of Title 18, United States Code, Section 641.

FORFEITURE

A. THEFT OF PUBLIC MONEY

1. Upon conviction for violations of Title 18, United States Code, Section 641, as charged in this Indictment, the Defendant, DENNIS OWEN PAULSEN, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offenses, including, but not limited to the following:

B. The property subject to forfeiture includes, but is not limited to, the following:

1. CASH PROCEEDS/MONEY JUDGMENT:

- a. A sum of money equal to all proceeds the Defendant obtained directly or indirectly from the offenses charged in Counts 1 and 2 of the Indictment, that is, a minimum of approximately \$1,678,997 in United States currency, and all interest and proceeds traceable thereto;

C. SUBSTITUTE ASSETS:

1. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the said Defendant up to the value of the above described forfeitable property;

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON


WILLIAM N. NETTLES (WED)
UNITED STATES ATTORNEY